

COUGHLIN MIDLIGE & GARLAND LLP
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Attorneys for Defendant Allianz
Global Risks US Insurance Company

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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VALEANT PHARMACEUTICALS :
INTERNATIONAL, INC.; VALEANT :
PHARMACEUTICALS INTERNATIONAL; and :
AGMS, INC., :
:
Plaintiffs, :
:
v. :
:
Civil Action. No: :
3:18-CV-00493 (MAS) (LHG) :
AIG INSURANCE COMPANY OF CANADA; :
ACE INA INSURANCE COMPANY; ALLIANZ :
GLOBAL RISKS US INSURANCE COMPANY; :
ARCH INSURANCE CANADA LTD; EVEREST :
INSURANCE COMPANY OF CANADA; :
HARTFORD FIRE INSURANCE COMPANY; :
IRONSHORE CANADA LTD; LIBERTY :
INTERNATIONAL UNDERWRITERS, a division : **NOTICE OF**
of LIBERTY MUTUAL INSURANCE : **MOTION TO COMPEL**
COMPANY; and LIBERTY MUTUAL : **PRODUCTION OF**
INSURANCE COMPANY; LLOYD'S : **SETTLEMENT AGREEMENT(S)**
UNDERWRITERS; LLOYD'S CONSORTIUM :
9885 (a/k/a STARR FINANCIAL LINES :
CONSORTIUM 9885); LLOYD'S SYNDICATE :
ANV 1861; LLOYD'S SYNDICATE AMA 1200; :
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S :
SYNDICATE AWH 2232; LLOYD'S : **ORAL ARGUMENT REQUESTED**
SYNDICATE BRT 2987; LLOYD'S SYNDICATE :
CVS 1919; LLOYD'S SYNDICATE HCC 4141; :
LLOYD'S SYNDICATE MITSUI 3210; :
LLOYD'S SYNDICATE MIT 3210; LLOYD'S :
SYNDICATE NAV 1221; LLOYD'S :
SYNDICATE QBE 1886; LLOYD'S :
SYNDICATE SJC 2003; ROYAL & SUN :
ALLIANCE INSURANCE COMPANY OF :

CANADA; TEMPLE INSURANCE COMPANY :
and XL INSURANCE COMPANY SE., :
: :
Defendants. :
-----X

TO: John E. Failla, Esq.
Proskauer Rose LLP
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and

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Four Gateway Center
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*Attorneys for Plaintiffs Valeant Pharmaceuticals International, Inc.,
Valeant Pharmaceuticals International and AGMS, Inc.*

COUNSEL:

PLEASE TAKE NOTICE that Defendant Allianz Global Risks US Insurance Company (“Allianz”), by and through its counsel, Coughlin Midlige & Garland LLP, shall move before the Special Master Hon. Douglas K. Wolfson, J.S.C. (Ret’d.), at such date and time hereafter as the undersigned may be heard, for an Order, pursuant to Rule 37 and Rule 26 of the Federal Rules of Civil Procedure:

- (i) compelling production of the settlement agreement(s) Plaintiffs entered into with Defendant AIG Insurance Company of Canada and Defendants Certain Underwriters at Lloyd’s, London Subscribing to Policy Number QB078513 and/or Allied World Assurance Company relative to the issues in controversy between them involving the

claims arising from the underlying Allergan Actions (subject to the terms of the Discovery Confidentiality Order entered in the above action); and

- (ii) finding that Allianz should be awarded its reasonable expenses, including attorney's fees, in bringing the subject Motion to Compel.

PLEASE TAKE FURTHER NOTICE that, in support of the subject motion, Allianz shall rely on the Memorandum of Law and Declaration of Suzanne C. Midlige, Esq. with attached exhibits submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested with respect to the subject motion; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order with respect to the subject motion has been submitted herewith.

Dated: April 19, 2022

Respectfully submitted,

COUGHLIN MIDLIGE & GARLAND LLP

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